ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20544

In the Matter of	)	
	)	
	)	
The Development of Operational,	)	WT Docket No. 96-86
Technical, and Spectrum	)	
Requirements for Meeting	)	
Federal, State, and Local Public	)	
Safety Agency Communication	)	
Requirements Through the	)	
Year 2010	)	

COMMENTS OF AERONAUTICAL RADIO, INC.

Aeronautical Radio, Inc. (ARINC), by its attorneys, hereby responds to the Commission's Notice of Proposed Rule Making released in this proceeding April 10, 1996 (FCC 96-155).

ARINC is the communications company of the air transport industry, formed at the suggestion of the Federal Radio Commission to provide civil aviation with communications on a coordinated, industry basis. ARINC, today, serves the communications needs of aviation through its air-ground voice radio services, its air-ground data communications services, its enhanced information interchange services and land mobile radio services provided in the vicinity of the nation's major airports. ARINC also assists in the formulation of industry views on communications matters by providing the secretariat functions for the Aeronautical Frequency Committee (AFC).[1]

[1] The AFC consists of representatives from the Aircraft Owners and Pilots Association (AOPA), Helicopter Association International (HAI), National Business Aircraft Association (NBAA), American Airlines, America West, Continental Air Lines, Delta Air Lines, Federal Express, Northwest Airlines, United Airlines, United Parcel Service, and USAir.

In response to the Commission's Notice, ARINC and civil aviation submit that the use of land mobile radio by the air transport industry at airports is intimately related to the safety of the public, where the airlines and their support organizations must assume many of the safety and emergency obligations of the mini-metropolis that the airport represents. These radio operations are unique in that they rely upon low-power portable communications over defined area and demand high levels of channel reliability and availability and immediate channel access, and these needs cannot be met by commercial service providers.

The aviation industry uses land mobile radio facilities intensively at the nation's major airports. Millions of passengers transit each of these airports each year, millions more come to meet and see off the passengers, and thousands of workers are present on each airport every day. Last year, for example, Chicago's O'Hare International Airport--the nation's busiest airport--handled more than 67 million passengers. The airlines and the airport authorities must accommodate the safety, security, and service needs of these people, while unloading, servicing, maintaining reloading, and releasing more than one thousand air transport aircraft each day. The turn-around time for aircraft during the day at hub airports is typically less than one hour. A critical utility used by the air transport companies to accomplish these tasks is two-way land mobile radio--primarily low power portable units.

These airport portable radios are used to coordinate customer service, dispatch and locate personnel, accommodate non-routine operations such as flight delays or diversions and emergencies, and respond to emergencies on the airport. These facilities are also used to coordinate emergency and safety activities with police and fire operations

on the airport and with off-airport security agencies. They are use routinely to accommodate the hundreds of medical emergencies arising every month and to meet special safety needs of passengers, such as wheel chairs or special transport.

Recent developments in airport security will place an increased demand on the land mobile communications requirements at the airports. Airport security concerns will impose new requirements on the air transport companies and the airport authorities and will also increase the need for intercommunication. The Federal Aviation Authorization Act of 1996 will require increased scrutiny of passengers, visitors, and others on the airport and increased screening of baggage and other cargo. These more intensive security functions will place greater demands on the land mobile communications facilities that the industry uses to promote safety. The airlines have been testing land mobile data communications for baggage tracking and matching, which has been required for international flights and may be imposed on domestic flights.

The air transport industry has been able to meet these needs using channels in the Business Radio Service, but these channels are severely congested and additional facilities have been difficult to find. In the Business Radio Service, the air carriers have only 10 channel pairs in the 450-470 MHz band for their exclusive use at the airports[2], the aviation terminal use channels (ATU). These channels are shared with other users 50 miles or more from the airports. ARINC has established shared 800 MHz trunked radio systems at 15 of the larger airports, and the individual air carriers have tried to use other restricted power and 12.5 kHz splinter channels to meet their burgeoning need for

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2 *See* 47 C.F.R. § 90.75(c)(25).

communications. The airlines operate thousands of portable and mobile units on the largest airports.

The Commission, in its Notice of Proposed Rule Making, proposes to adopt the definitions of "public safety" recommended by the Public Safety Wireless Advisory Committee (PSWAC)[3], which would include a large amount of non-safety and non-emergency communications by public sector entities defined as "public safety services," but would relegate services, such as ATU, to "public safety support providers" or, perhaps, "public services." These definitions do not take into account the distinct operational needs of the different radio services supporting the safety of the public and by including many services, such as the present local government service, that do not support safety or emergency service, and as a result the important focus on safety communications is lost. A more useful approach would be to identify first those services that are truly safety services and make certain that safety and emergency communications needs are met first for public and private sector operators. In providing additional spectrum resources for public safety services, the Commission should take into account the safety and emergency communications needs of the air transport industry at the nation's airports.

The Commission also suggests public safety agencies should make greater use of commercial services.[4] The aviation industry has found this to be impracticable. Commercial service vendors prefer to cater to the wide-area, low intensity uses of communications. They have been unable, or unwilling, to provide the type of airport coverage necessary or to accommodate the levels of communications intensity

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[3] Notice ¶ 25.

encountered on the airports. Private systems will continue to be needed in the future to meet the needs of aviation for land mobile communications to protect the safety and well being of the traveling public and the many visitors to our nation's airports.

ARINC and air transport industry generally support the efforts of the Commission, the PSWAC, and other agencies to meet the communications requirements for public safety. In so doing, however, the air transport industry urges the Commission to take account of the unique communications needs on the nation's airports to protect and serve the public.

Respectfully submitted,

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[4] *Id.* ¶¶ 86, 89-90.